

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

**VICTORIA BARGHOUT, JENNIFER
CHRISTIANSSEN, BARBARA FERGINGA,
JENNIFER MUSUMECI, LAURA REILLY,
KAREN SALOMON, NATALIE CELSKE, VERA
SANTANGELO, GRETCHEN LIENHOP,
MARYJEAN SAWYER and MICHELLE SIMPSON,
individually and on behalf of a class of
similarly-situated female employees,**

Plaintiffs,

-- against --

**BAYER HEALTHCARE PHARMACEUTICALS,
BAYER HEALTHCARE CONSUMER CARE,
BAYER HEALTHCARE ANIMAL HEALTH,
BAYER HEALTHCARE LLC, BAYER
CORPORATION, HERM CUKIER, DENISE
D'AGOSTINO, SUSAN HERSTER, SEAN
KOLB-HUNT, DUNCAN LAMB, LESLIE NORTH,
STEFAN OELRICH, ROBERT ROSEN, TODD
WILLIAMSON, FRANK KNAPP, LAWRENCE
PLATKIN and CLEVE SCOTT.**

Defendants.

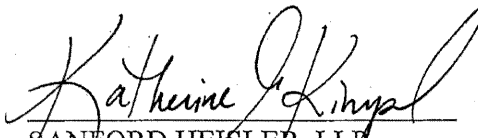
No. 2:11-cv-1576 (DMC/JAD)

**JOINT STIPULATION OF
DISMISSAL OF THE
CLAIMS OF PLAINTIFF
KAREN SALOMON AND
OF THE CLAIMS
AGAINST DEFENDANT
SUSAN HERSTER**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs Victoria Barghout, Jennifer Christiansen, Barbara Feringa, Jennifer Musumeci, Laura Reilly, Karen Salomon, Natalie Celske, Vera Santangelo, Gretchen Lienhop, MaryJean Sawyer, and Michelle Simpson and Defendants Bayer HealthCare Pharmaceuticals Inc., Bayer HealthCare Consumer Care, Bayer HealthCare Animal Health, Bayer Healthcare, LLC and Bayer Corporation, by and through their undersigned counsel, hereby stipulate and agree to dismiss with prejudice and without costs or fees to either party: (1) all of Plaintiff Karen

Salomon's claims in the above-captioned action; and (2) all claims against individual defendant Susan Herster, who shall be dismissed with prejudice as a defendant from this action. The parties further stipulate and agree to strike paragraphs 52, 53, and 304 to 354 of the Third Amended Complaint (Dkt. No. 48).

STIPULATED AND AGREED:


SANFORD HEISLER, LLP
Katherine M. Kimpel*
Matthew L. Schmid*
Lauren E. Seffel*
Katherine E. Lamm*
1666 Connecticut Avenue NW, Suite 300
Washington, DC 20009
Tel: 202.499.5200
Fax: 202.499.5199

Jennifer Siegel (JS-6110)
1350 Avenue of the Americas, 31st Floor
New York, NY 10019
Tel: 646.402.5650
Fax: 646.402.5651

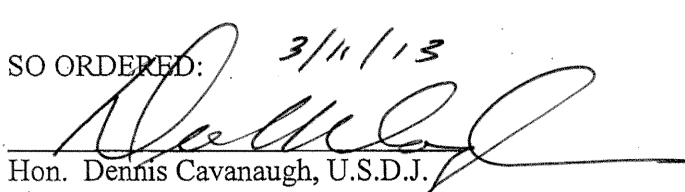
Attorneys for Plaintiffs

**Admitted pro hac vice*

s/ Sarah E. Bouchard
MORGAN, LEWIS & BOCKIUS LLP
(Pennsylvania Limited Liability
Partnership)
Michael L. Banks (admitted pro hac vice)
Sarah E. Bouchard (NJ ID# 02807-1995)
Blair J. Robinson (N
J ID# 040712004)
W. John Lee (NJ ID# 18502007)
A. Klair Spiller (NJ ID # 033032010)
1701 Market Street
Philadelphia, PA 19103-2921
Tel: 215.963.5387/5077/5398/5210/4935
Fax: 215.963.5001

Attorneys for Defendants

SO ORDERED:

3/11/13

Hon. Dennis Cavanaugh, U.S.D.J.